

REMARKS

Claim 7 stands rejected under 35 U.S.C. 112, first paragraph, as containing subject matter which was not described in the specification. Claim 7 has been amended to more clearly describe the password features of the present invention, and Applicants respectfully traverse. Support for this amendment can be found on the first five lines of page 20 of the Specification to the present Application, and Applicants submit that the outstanding rejection of claim 7 has been overcome by this amendment.

Claim 15 stands rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. Claim 15 has been amended to more clearly recite the present invention, and Applicants submit that this rejection has also been overcome by these amendments.

Claims 1, 6-8, and 13-19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Ganesan (U.S. 5,748,735) in view of Kaufman (U.S. 6,178,508). Applicants respectively traverse this rejection because neither of the cited references, whether taken alone or in combination, discloses or suggests the generation of different random key data for each of a plurality of unit storage areas of a storage medium, as featured in the independent claims of the present invention, as amended.

The present invention has been amended to more clearly recite that the key data featured in the present invention are random key data. The key data of the present invention therefore, are significantly different from the key data taught by either Ganesan or Kaufman.

Ganesan teaches a system having an asymmetric crypto-key which includes a public key portion and a corresponding private key portion. (See column 6, lines 5-8). The public key portion may be a symmetric crypto-key, but this symmetric crypto-key is still encrypted with a private key portion particular to each of a plurality of system users. (See column 6, lines 17-20). One skilled in the art is well apprised that private keys chosen by various individual users of a system are significantly different from random keys generated according to the present invention. This difference between the two types of keys illustrates the inapplicability of Ganesan to the present invention.

Kaufman discloses a system of hashing passwords together to form cryptographic keys. Similar to Ganesan though, Kaufman fails to teach or suggest use of random key data. In fact, Kaufman appears to teach away from the use of random key data. (See column 6, lines 3-24). The use of the exclusive-OR by Kaufman fails to overcome the lack of a teaching or suggestion to use random key data for its password key, or its file key. Because neither Ganesan or Kaufman teaches or suggests the use of random key data, an obviousness rejection based on these two references cannot be properly maintained.

Moreover, the combination of these two cited prior art references is further inapplicable to the present invention because neither could realize the advantageous benefits of protecting data on a storage medium which are realized by the present invention. Ganesan is drawn to a system for protecting multiple-user networks and user data accessing the networks, such as the Internet. Kaufman, on the other hand, is drawn

to a system to simplify and protect password entry and storage of individual user passwords on a multiple user system, as opposed to a method which protects the data of the system itself. Neither of these references can achieve the benefits of the present invention, which is drawn to protecting the data of a storage medium. Accordingly, neither of the two cited references could suggest a motivation for their combination to achieve the present invention.

Furthermore, the storage medium of the present invention is encrypted with the generated random key data separately, and not by using a password directly as an encryption key, as taught by both Ganesan and Kaufman. Because both prior art references teach this direct password encryption, and not random key data encryption, both references serve to teach away from the present invention. Accordingly, the Section 103 is further traversed for at least these additional reasons.

Additionally, neither of the two cited prior art references teaches or suggests the step of generating different random key data for each of a plurality of unit storage areas on a storage medium. As discussed above, the two prior art references are drawn toward systems which protect access by users to a database, and the passwords of the users used to access such a database. Neither reference, however, focuses on protection of the data of a storage medium itself, separate from issues of user access to such data. The focus of both references is therefore significant in that neither of them could thus teach or suggest the generation of different random key data for each of many unit storage areas on a storage medium. This claimed portion of the present invention

enables the present invention to realize significant advantages, as outlined in the Specification to the present Application, which those skilled in the art will be aware are not achievable by either of the two cited prior art references, alone or in combination. According for at least these reasons as well, the Section 103 rejection of the present invention based on a combination of Ganesan and Kaufman is again respectfully traversed.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-19, is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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